

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
---	--

This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-cv-06978
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-09849
Kathleen Ashton, et al v. Al Qaeda Islamic Army, et al., Case No. 02-cv-06977
Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., Case No. 04-cv-01923
Continental Casualty Co., et al. v. Al Qaeda, et al., Case No. 04-cv-05970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., Case No. 04-cv-07065
Euro Brokers, Inc., et al. v. Al Baraka, et al., Case No. 04-cv-07279

**NOTICE OF PLAINTIFFS' MOTION TO COMPEL DEFENDANTS MUSLIM WORLD
LEAGUE AND INTERNATIONAL ISLAMIC RELIEF ORGANIZATION TO
PRODUCE RESPONSIVE DOCUMENTS PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 37(a)**

PLEASE TAKE NOTICE that upon the Declaration of J. Scott Tarbutton, Esq. and the exhibits attached thereto, and the Memorandum of Law in Support of Plaintiffs' Motion to Compel Defendants Muslim World League and International Islamic Relief Organization to Produce Responsive Documents, the plaintiffs by and through their undersigned counsel will move the Court before the Honorable Sarah Netburn, U.S. Magistrate Judge, at the United States District Court for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, Room 430, Courtroom 219, at a date and time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 37(a), directing the Muslim World League and International Islamic Relief Organization to immediately produce all documents responsive to plaintiffs' discovery, including documents and information previously ordered produced by this Court on April 12, 2011 and April 24, 2011. Plaintiffs seek this relief for the reasons set

forth in the Memorandum of Law in Support of Plaintiffs' Motion to Compel Defendants Muslim World League and International Islamic Relief Organization to Produce Responsive Documents Pursuant to Federal Rule of Civil Procedure 37(a).

Dated: December 1, 2017

Respectfully Submitted,

/s/ J. Scott Tarbutton
Sean P. Carter, Esq.
J. Scott Tarbutton, Esq.
COZEN O'CONNOR
1650 Market Street, Suite 2800
Philadelphia, PA 19103
Tel: (215) 665-2000

Jodi Westbrook Flowers, Esq.
Robert T. Haeferle, Esq.
MOTLEY RICE, LLC
28 Bridgeside Boulevard
P.O. Box 1792
Mount Pleasant, SC 29465
Tel: (843) 216-9000

James P. Kreindler, Esq.
Andrew J. Maloney, III, Esq.
KREINDLER & KREINDLER, LLP
750 Third Avenue, 32nd Floor
New York, NY 10017
Tel: (212) 687-8181

Jerry S. Goldman, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, NY 10020
Tel: (212) 278-1000

Robert M. Kaplan, Esq.
FERBER CHAN ESSNER & COLLIER, LLP
60 East 42nd Street, Suite 2050
New York, New York 10165
Tel: (212) 944-2200

Christopher T. Leonardo, Esq.
ADAMS HOLCOMB LLP
1001 Pennsylvania Ave., N.W.
Suite 740-South
Washington, D.C. 20004
Tel: (202) 580-8820

Attorneys for Plaintiffs